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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 SERGIO SANCHEZ-ZAMBRANO,
15 Defendant.

Case No. 2:18-cr-387-JCM-VCF

STIPULATION TO CONTINUE
MOTION DEADLINES
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United
18 States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United
19 States of America, and Rene L. Valladares, Federal Public Defender, and Brenda Weksler,
20 Assistant Federal Public Defender, counsel for Sergio Sanchez-Zambrano, that the pretrial
21 motions and notices of defense deadline currently scheduled for December 28, 2018, be vacated
22 and continued to January 11, 2019.

23 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
24 shall have to and including January 25, 2019, to file any and all responsive pleadings.

25 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
26 shall have to and including February 1, 2019, to file any and all replies to dispositive motions.

1 The Stipulation is entered into for the following reasons:

2 1. Counsel for the defense needs additional time to discuss matters concerning the
3 pre-trial motion with her client.

4 2. The defendant is incarcerated and does not object to the continuance.

5 3. The parties agree to the continuance.

6 4. The additional time requested herein is not sought for purposes of delay, but
7 merely to allow counsel for defendant sufficient time within which to be able to effectively and
8 complete investigation of the discovery materials provided.

9 This is the first stipulation to continue filed herein.

10 DATED this 28th day of December, 2018.

11 RENE L. VALLADARES
12 Federal Public Defender

DAYLE ELIESON
United States Attorney

13 */s/ Brenda Weksler*
14 By _____
15 BRENDA WEKSLER
Assistant Federal Public Defender

/s/ Jared L. Grimmer
By _____
JARED L. GRIMMER
Assistant United States Attorney

